



September 28, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Re: NEAT Application

To Whom It May Concern:

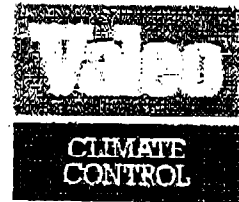
Enclosed is a completed *National Environmental Achievement Track Application* and *Environmental Requirements Checklist* for ZEXEL Valeo Compressor USA. We are confident you will find the enclosed material in order.

If you should require additional information, please do not hesitate to call me directly at (217) 362-2318. We anticipate a positive decision regarding our participation in this program. Thank you for your time, consideration, and the opportunity to be involved.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronda Moore", is written over the typed name.

Ronda Moore
Environmental and Safety Manager



Zexel Valeo Compressor USA, Inc.

625 Southside Drive
Decatur, IL 62521
(217) 362-2300
fax (217) 428-7687

Fax Cover Sheet

Date: November 20, 2000

To: Mark Messersmith

Fax Number: (312) 353-5374

From: Ronda Moore

Subject: Performance Track Application

Number of Pages (including Cover Sheet) 5

The following is in reference to issues discussed in our telephone conversation on November 16. You stated after the State Review, there were some concerns with our first past aspect, Atomofel. We explained in the application that we were successful at eliminating this source of trichloroethylene from our production process. I understood from our conversation that the state had concerns that trichloroethylene use may have increased in other areas. After reviewing our records, trichloroethylene use has not increased as seen in the following table.

Trichloroethylene Summary

Calendar Year	Amount Used/ Processed (lbs.)	Emissions (<i>Annual Emissions Report</i>) (tons)	Waste (<i>Annual Waste Report</i>) (Gallons)
1997	310,079	45.5008	23,000
1998	230,824	39.4988	19,000
1999	234,133	24.739	19,000
2000 (Year-To-Date)	143,125	18.4799	10,000

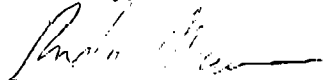
In addition, you had asked for a description of our facility, and definition of our Environmental Management System. In August ZEXEL USA Corporation and Valeo Climate Control entered a joint venture. As a result of the joint venture, Valeo Climate Control assumed ownership of the Evaporator Manufacturing portion of our business, and ZEXEL retained ownership of the

Compressor Manufacturing portion of the business. Both ZEXEL and Valeo are located in the same facility; however, they are managed separately.

Please note the EMS referenced in the application is solely for ZEXEL's Compressor Manufacturing business.

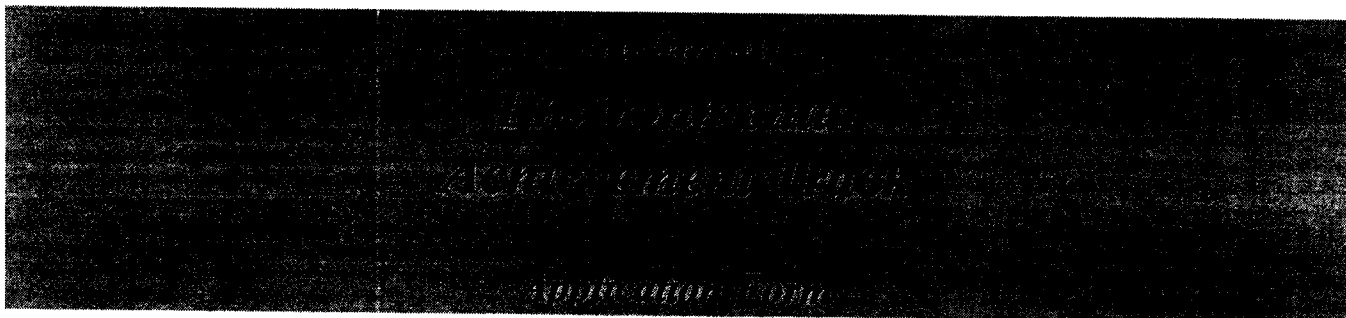
I have also included the initialed changed application pages. The complete application packet with the initialed changes will also be faxed to Emily Levin, at Industrial Economics Corporation. If you require additional information, please contact me as soon as possible at (217) 362-2318.

Sincerely,



Ronda Moore
Environmental and Safety Manager

AOS-0024



ZEXEL Valeo Compressor USA

Name of facility

ZEXEL Valeo Climate Control

Name of parent company (if any)

625 Southside Drive

Street address

Street address (continued)

Decatur, IL 62521

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Ronda Moore

Title Environmental and Safety Manager

Phone (217) 362-2318

Fax (217) 428-7687

E-mail rmoore@zexelusa.com

Section A

Tell us about your facility.

1 What do you do or make at your facility?

ZEXEL manufactures rotary compressors for automotive air conditioning systems.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3585

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

ILD182768085

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

See enclosed checklist

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

ZEXEL received its Certificate of Registration under ISO 14001 in June of 1999.

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- a. Environmental policy ☒ Yes
- b. Planning ☒ Yes
- c. Implementation and operation ☒ Yes
- d. Checking and corrective action ☒ Yes
- e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazardous Materials Use	1033	lbs	0	lbs
<p>i. How is the current level an improvement over the previous level?</p> <p>The levels given above represent our use of a material called Atomofel. Atomofel was 64% trichloroethylen. Eliminating the use of atomofel is an improvement since it supports our commitments to provide a healthy workplace, and to reduce our use of toxic substances.</p>				
<p>ii. How did you achieve this improvement?</p> <p>Atomofel was used as an o-ring backing in the assembly or compressors. The Atomofel helped create the seal with a gasket. An engineering design change on our compressors eliminated the need for atomofel use by modifying the grove in which the gasket sits.</p>				

Second aspect you've selected

MWB 11/20/00

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
BOD Discharges to Water	Quantity 370	Units mg/L	Quantity 275	Units mg/L
<p>i. How is the current level an improvement over the previous level?</p> <p>The average BOD concentration has been significantly lowered in our discharge over the last two years.</p>				
<p>ii. How did you achieve this improvement?</p> <p>Main contributors of BOD were identified and controlled through elimination or additional pre-treatment. In addition, improvements were made to enhance our pre-treatment quality. These improvements included documented procedures and additional analytical equipment. Self-Monitoring and reporting was also done to check and verify improvements.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

Release History

☒ Yes ☐ No

☒ Option A:
Absolute value

2 Incidents
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

0 Incidents
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

We are targeting our biggest contributor of trichloroethylene related incidents, a vapor degreaser. Internal incident reports are in addition to any regulatory reporting requirements. These reports may include injuries, breakdowns, or releases. Planned improvements include fixed plumbing verses hand pumps, and documented control procedures (work instructions) for certain operations at the degreaser.

Y. M. B.
11/26/00

Second aspect you've selected

a. What is the aspect?

Total Solid Waste

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

185,295 Gallons
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

130,000 Gallons
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

The above values represent the quantity of waste disposed of as "Used Oil". The actual oil content of the waste averages around 10%. Other constituents include machining coolants, organic resin rinse water, and water. We are investigating an evaporation unit to dewater the waste to eliminate the quantity that must be handled.

Third aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- e. How will you achieve this improvement?

BOD Discharges to Water

☒ Yes ☐ No

☒ Option A:
Absolute value

YMAK
11/20/00
275 mg/L
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

☒ Option A:
Absolute value

100 mg/L
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

We continue to monitor BOD concentration at Ultrafiltration. If the BOD level is high enough, we divert the flow to a carbon filter. The carbon filter is currently on a trial basis. However, if we see positive results, it will become a permanent countermeasure for high BOD levels.

Fourth aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- e. How will you achieve this improvement?

Total Materials Use

☐ Yes ☒ No

☒ Option A:
Absolute value

19,127 Gallons
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

☒ Option A:
Absolute value

9564 Gallons
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

We are trialing an advanced coolant filtration system on one machining line. The current coolant life is about one month. It is estimated the new filtration system will extend the life to at least 2 months. With extended coolant life, we expect to see a reduction in the amount of coolant consumed.

Section D

Tell us about your public outreach and reporting.

1 How do you identify and respond to community concerns?

Concerns from the community are directed to designated personnel depending on the necessary response, according to our written documented communication procedure. We also participate in the Macon County, Community Environmental Council which has members from all segments of the community.

2 How do you inform community members of important matters that affect them?

Our participation in the Community Environmental Council allows us a direct path to disseminate environmental information among the community. Through presentations and meetings. We have also in the past used massed mailings to inform community members of environmental matters which may affect them.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website www.

☐ Newspaper

☐ Open Houses

☒ Other

Communications, Presentations, and other outreach activities through the Community Environmental Council will be used to report to the public. We will also use our company newsletter to distribute information on our Environmental Performance.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/Citizen Group</i>	Macon County Community Environmental Council	Gary Crull	(217) 475-4025
<i>State/Local Regulator</i>	Illinois Environmental Protection Agency	Mark Gerberding	(217) 785-8797
<i>Other community/local reference</i>	Macon County Department of Solid Waste	Sherry Ludlam	(217) 425-4505

Section E

Application and Participation Statement.

On behalf of ZEXEL Valeo Compressor USA, Inc.
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Michael D. Brotherton 9/28/00

Printed Name/Title Michael D. Brotherton

Facility Name ZEXEL Valeo Compressor USA, Inc.

Facility Street Address 625 Southside Drive

Facility ID Numbers ILD182768085

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name ZEXEL Valeo Compressor USA
Facility Location: Decatur, Illinois
Facility ID Number(s): ILD182768085
(attach additional sheets if necessary)

Air Pollution Regulations

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

Check All
That Apply

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

13. National Emission Standards for Hazardous Air Pollutants (40 CFR 63)
- 14.

<input checked="" type="checkbox"/>
<input type="checkbox"/>

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste
 - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. ☐
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. ☐
- 7. ☐

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐

- | | |
|---|-------------------------------------|
| 4. Solid Waste Storage and Removal Requirements | <input checked="" type="checkbox"/> |
| 5. Disposal Requirements for Special Wastes | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

- | | |
|----|--------------------------|
| 6. | <input type="checkbox"/> |
| 7. | <input type="checkbox"/> |

Water Pollution Control Requirements

- | | |
|---|-------------------------------------|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) | <input checked="" type="checkbox"/> |
| 2. Designation of Hazardous Substances (40 CFR 116) | <input type="checkbox"/> |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) | <input checked="" type="checkbox"/> |
| 4. NPDES Permit Requirements (40 CFR 122) | <input checked="" type="checkbox"/> |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129) | <input type="checkbox"/> |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) | <input checked="" type="checkbox"/> |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) | <input type="checkbox"/> |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) | <input type="checkbox"/> |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) | <input type="checkbox"/> |
| 10. Water Quality Standards | <input type="checkbox"/> |
| 11. Effluent Limitations for Direct Dischargers | <input checked="" type="checkbox"/> |
| 12. Permit Monitoring/Reporting Requirements | <input checked="" type="checkbox"/> |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | <input checked="" type="checkbox"/> |
| 14. Collection, Handling, Processing of Sewage Sludge | <input type="checkbox"/> |
| 15. Oil Discharge Containment, Control and Cleanup | <input type="checkbox"/> |
| 16. Standards Applicable to Indirect Discharges (Pretreatment) | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

- | | |
|-----|--------------------------|
| 17. | <input type="checkbox"/> |
| 18. | <input type="checkbox"/> |

Drinking Water Regulations

- | | |
|--|--------------------------|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | <input type="checkbox"/> |
| 2. National Primary Drinking Water Standards (40 CFR 141) | <input type="checkbox"/> |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) | <input type="checkbox"/> |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources | <input type="checkbox"/> |
| 5. Underground Injection Control Requirements | <input type="checkbox"/> |

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☒
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐

☐
☐

2. RCRA Corrective Action (identify)

Voluntary Clean-up of VOC contaminated soil and ground water on site,
from previous owner.

☒☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

3.

☐

4.

☐